



U.S. Department of Justice

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March 27, 2019

Via Email

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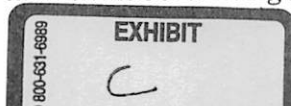
Re: *United States v. Kealoha, et al.*, CR 17-00582-JMS-RLP/18-00068-JMS-RLP
Discovery Production #14

Dear Counsel:

On March 21, 2019, we produced an unencrypted wallet drive containing Production #14 via Federal Express to all counsel except Ms. Kagiwada. On March 22, 2019, we produced an unencrypted wallet drive containing Production #14 via certified USPS mail to Ms. Kagiwada. Please let us know if you have not received the discovery package yet. Once you receive the package, we ask that you please download the items to your computers and return the wallet drive to us at the following address:

Santy Smith
United States Attorney's Office
Federal Office Building
880 Front Street, Room 6293
San Diego, CA 92101-8893

Production #14 consists of approximately 518 new pages of discovery and 22 media files, as discussed further below. The items were produced subject to the terms of the Protective Order in this case and divided amongst the following folders on the wallet drive:



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1. GJ Exhibits
2. GJ Returns
3. GJ Transcripts
4. Media_GJ Audio
5. Other
6. Reports

The “GJ Returns” folder contains returns from Hawaii Central Federal Credit Union (“KEALOHA-GJ-BL792-HCFCU”). This return consists of approximately 363 pages. This discovery is related to the charges in the bank fraud case – CR 18-00068-JMS-RLP – and will not be introduced during the United States’ case-in-chief in the mailbox trial.

The “GJ Transcripts” folder contains three grand jury transcripts. Two of these transcripts – pertaining to the testimonies of Daniel Sellers and Maile Rego – were previously produced in redacted form on December 15, 2017, in Production #2 (“KEALOHA-GJT-003759-R” and “KEALOHA-GJT-005619-R”). Approximately two of 88 pages were redacted from “KEALOHA-GJT-003759-R” (transcript of Daniel Sellers) and approximately two of 59 pages were redacted from “KEALOHA-GJT-005619-R” (transcript of Maile Rego). We have now re-produced the transcripts in an unredacted format.

The “Media_GJ Audio” folder contains additional audio recordings obtained by the United States of grand jury testimony of witnesses. (In Production #13, the United States produced audio recordings from Gordon Shiraishi and Minh-Hung Nguyen’s grand jury appearances.) These recordings are being produced pursuant to a Court order authorizing disclosure under Federal Rule of Evidence 6(e). *See* CR 17-00582-JMS-RLP at ECF No. 487. The transcripts from this grand jury testimony were previously produced to all counsel on December 15, 2017, in Production #2, and March 16, 2018, in Production #4.

The “Other” folder contains additional documents obtained from Supervisory Special Agent (“SSA”) Edwin Nam (“KEALOHA-NAM-00014” and “KEALOHA-NAM-00015”). With this production, the United States is providing additional notice regarding the testimony of SSA Nam. This notice supplements the prior notice regarding SSA Nam given to all counsel by letter dated February 7, 2019. In Production #2 on December 15, 2017, the United States produced cell data for cellular telephone number (808) 220-4984, used by Gerard Puana (KEALOHA-15MC0157-8082204984-000001 through 316). The cell data produced by the service provider, Mobi PCS, included cell site data. However, Mobi PCS did not produce to the United States the tools necessary to interpret the cell site data in its production pursuant to the court order. SSA Nam obtained those tools through a law enforcement database, and they are now being provided to you in Production #14 (“KEALOHA-NAM-00014” and “KEALOHA-NAM-00015”). Using those tools, SSA Nam analyzed Gerard Puana’s cell site data for the time period of June 2013. SSA Nam’s analysis is attached to this letter. The United States intends to offer SSA Nam’s testimony regarding his analysis in its case-in-chief at trial.

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We have also included a searchable Index listing the items produced in this round of discovery. As previously agreed upon, we are providing the Index solely as a tool to assist you in locating and identifying items in discovery; the Index itself is not evidence. The Index lists the description of the item and the beginning and ending Bates-numbers. All discovery items are provided in a searchable format, as either a native file or searchable PDF file. You may notice gaps in the Bates-numbering; these gaps are intentional. However, please advise us if, after a review of the documents, you believe you are missing a document or a document is not viewable.

Further, in Production #13, we produced items recovered from a hard drive obtained from HPD ("KEALOHA-LK-HD-000001"). Our letter dated March 8, 2019, accompanying Production #13, listed some of the search terms that were used to search the hard drive. Below, as Attachment A to this letter, is an updated list of all the search terms used.

Finally, as a continuing reminder, physical evidence is available for viewing at the FBI's Honolulu Field Office located at 91-1300 Enterprise Street, Kapolei, HI 96707. If you wish to view these items in advance of trial, please contact us to coordinate a mutually convenient time.

Any discovery provided that may exceed the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute, or relevant case law is provided voluntarily and solely as a matter of discretion. By producing such materials, the United States does not waive its right to object to any future discovery requests beyond the ambit of its legal obligations. The United States will continue to comply with its discovery obligations.

To date, the United States has only received reciprocal discovery from Defendant Derek Hahn. The United States continues to request all reciprocal discovery to which it is entitled under Rules 16(b) and 26.2 of the Federal Rules of Criminal Procedure. The United States also continues to request notice of any intention of your clients to rely on a defense involving entrapment, duress, alibi, or mental condition.

Please do not hesitate to contact us if you have any questions about any of the above or any original physical evidence in the custody of the FBI.

Sincerely,

WILLIAM P. BARR
Attorney General

ROBERT S. BREWER, JR.
United States Attorney

/s/ Janaki S. Gandhi
JANAKI S. GANDHI
Special Attorney to the Attorney General

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Attachment A

1. Puana	32. Larry Tong
2. Gerard	33. Perjure
3. Gerry	34. Stolen
4. Uncle	35. Sellers
5. Florence	36. Danny
6. Flo	37. Reverse Mortgage
7. Grand jury	38. Identity Theft
8. Subpoena	39. Fentanyl
9. Mailbox	40. McKinney
10. Kealaolu	41. Rudy
11. Shiraishi	42. Katherine
12. Gordo	43. Kat
13. Gordon	44. Kathy
14. Hahn	45. Letha
15. Derek	46. EC#14-284
16. Bobby Nguyen	47. Mama
17. Minh-Hung	48. Toandfrompepper
18. Bobby	49. Diego
19. Niall Silva	50. Conspiracy
20. Niall	51. FJC
21. Alison	52. Kaneshiro
22. Tiffany	53. alisonleewong@yahoo.com
23. Masunaga	54. toandfrompepper@yahoo.com
24. Ahn	55. kathykealoha@yahoo.com
25. Adam Wong	56. kealoha1ohana@gmail.com
26. Ghost Ticket	57. kathykealoha@gmail.com
27. Lexus	58. wizardhawaii4@gmail.com
28. Acura	59. gclifford90@yahoo.com
29. Arakaki	60. bob.win2006@gmail.com
30. Les	61. dhahn22@gmail.com
31. Osborne	

FEDERAL BUREAU OF INVESTIGATION CELLULAR ANALYSIS SURVEY TEAM



Cellular Analysis

Phone Number:	(808) 220-4984
Associated Name:	Gerard Puana
Mobile Network:	Mobi PCS

SA Edwin Nam

Historical Cell Site Analysis



1. Background

The Federal Bureau of Investigation (FBI) Cellular Analysis Survey Team (CAST) analyzed cell phone records for the phone number (808) 220-4984 ("target cell phone").

2. Methodology

An analysis was performed on the call detail records obtained for the target cell phone. The call detail records documented the network interactions to and from the target cell phone. Additionally, the records documented the cell towers and cell sectors ("cell sites") that served the cell phone during the activity. Used in conjunction, the call detail records and a list of cell site locations were analyzed to illustrate an approximate location of the target cell phone when it initiated contact with the network.

2.1 Cell Site Locations

Cell sites in existence during the time of the incident were input into mapping software using latitude/longitude coordinates provided by the service provider. The cell sites associated with the target cell phone were located using the mapping software and the plotted cell site data.

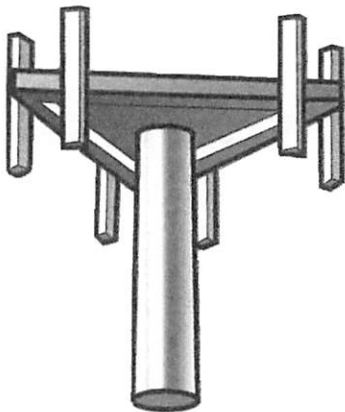
3. Conclusions

Historical cell site analysis was performed on the call detail records for the target cell phone. The methods detailed in Sections 2 and 2.1 were used to produce the following historical cell site analysis maps.

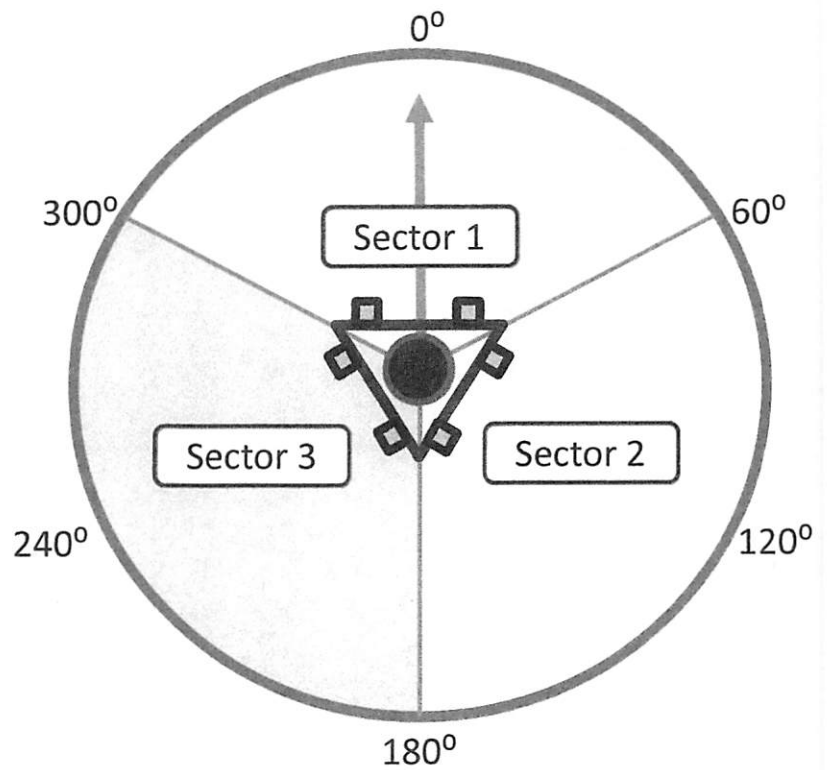
Sector Orientations Example

Each cell site orientation can vary.

Three Sector Tower



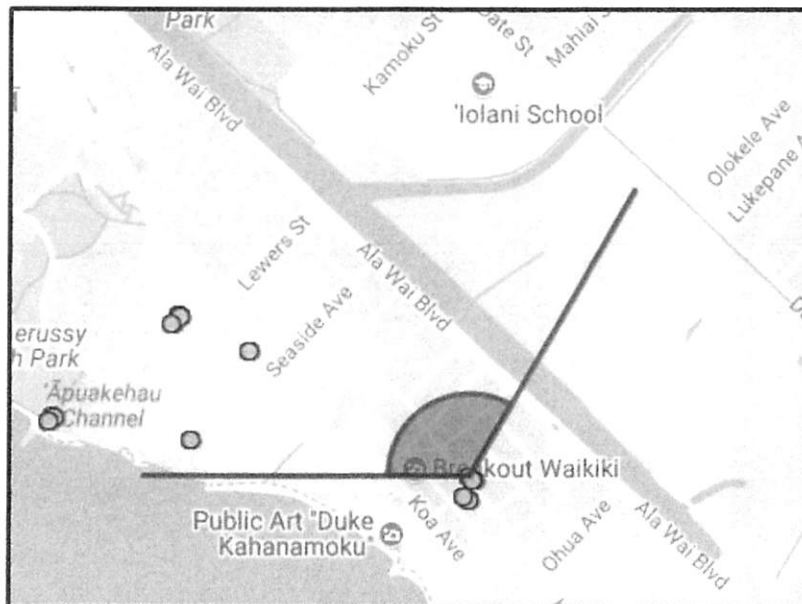
Three Sectors



Sector Usage Illustration



Cell towers and sectors showing usage are illustrated on the following maps using this wedge symbol:



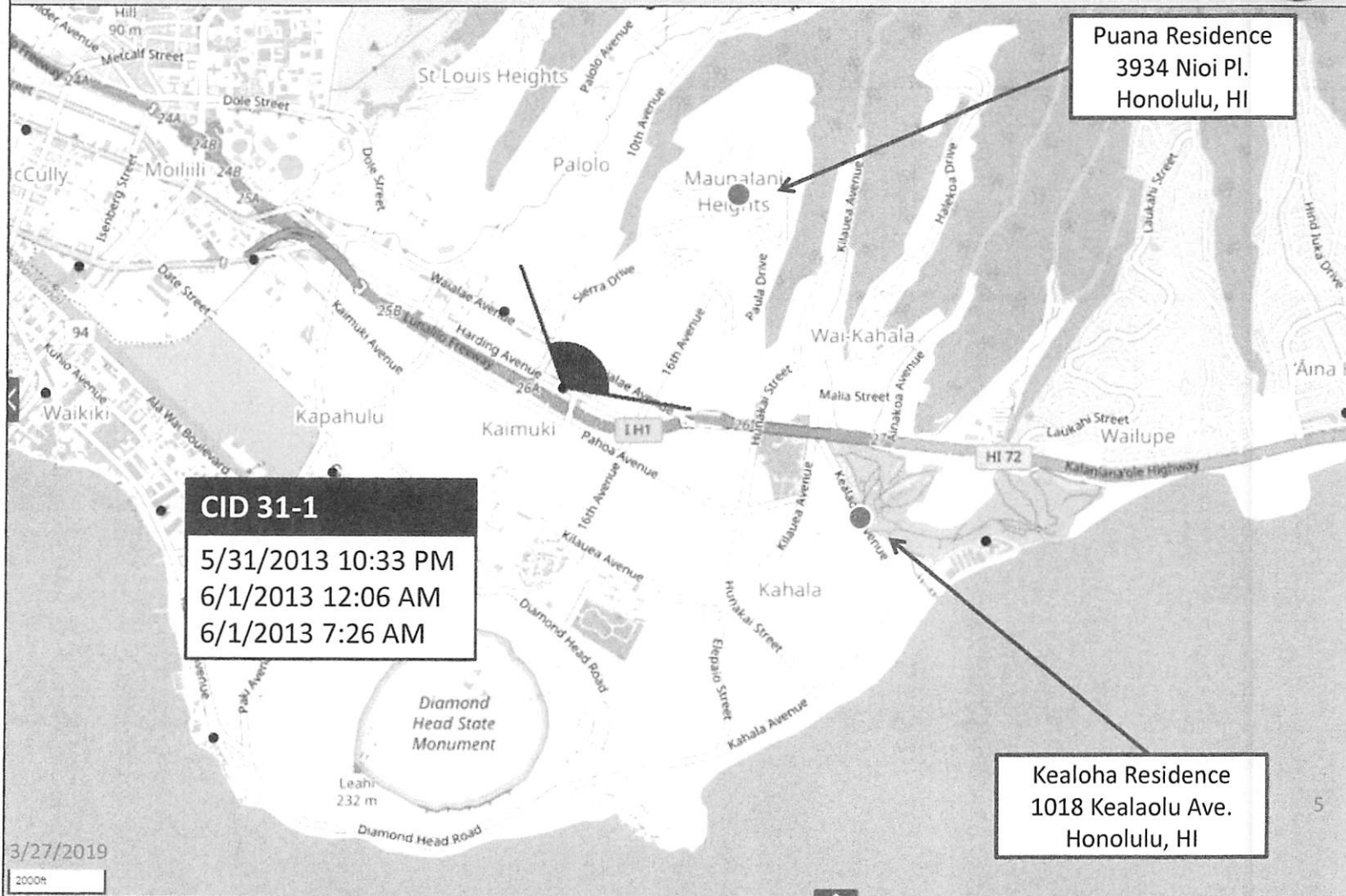
The shaded area inside the sector arms demonstrate the direction the antennas on the cell towers were oriented, not the RF footprint or coverage area of the cell sector.

These symbols will be used in the following pages to illustrate the cell sites and sectors used during the time period of analysis and the general area where the cellular telephones were located.

Historical Cell Site Analysis

Cell Tower Activations

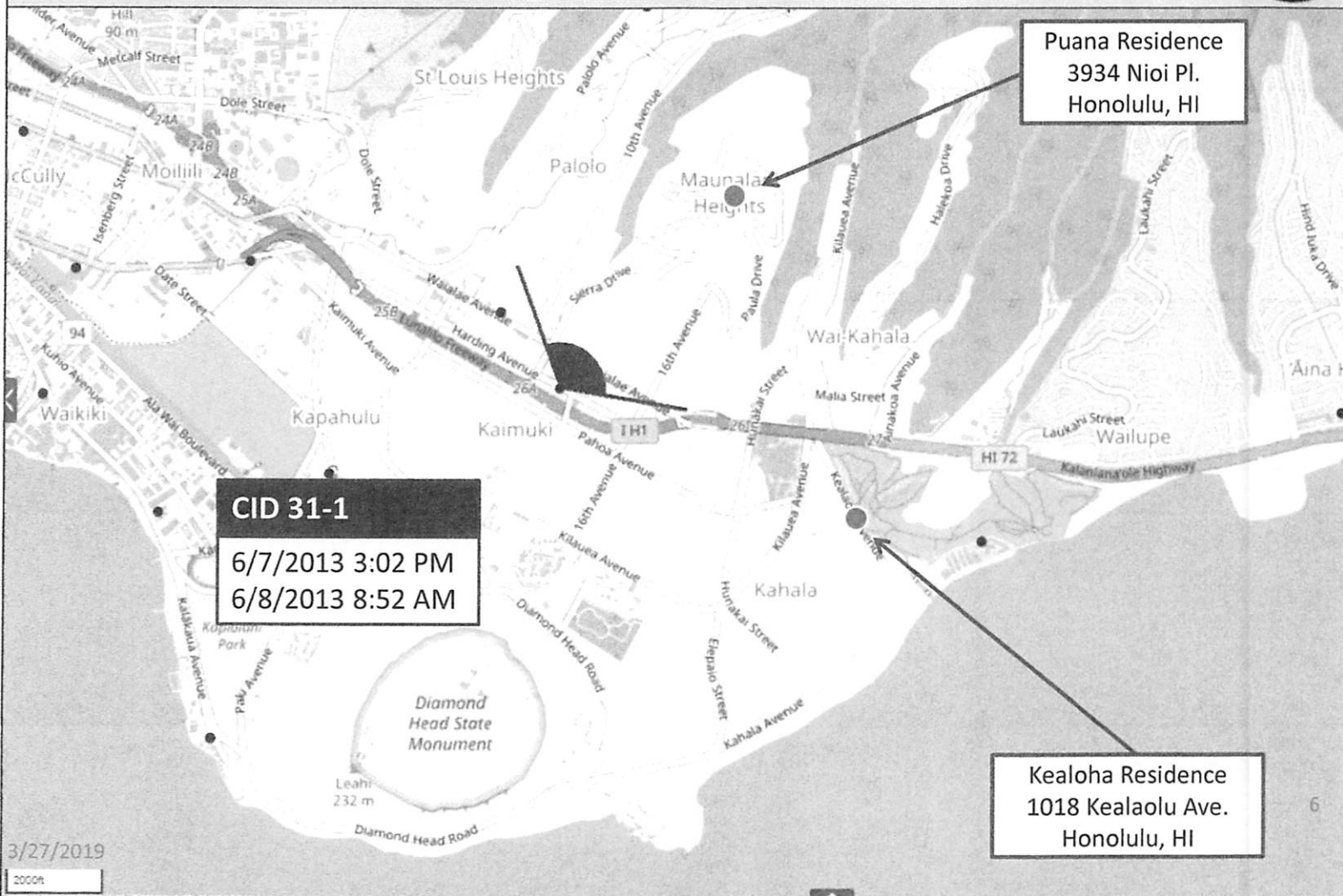
May 31 - June 1, 2013 (HST)



Historical Cell Site Analysis

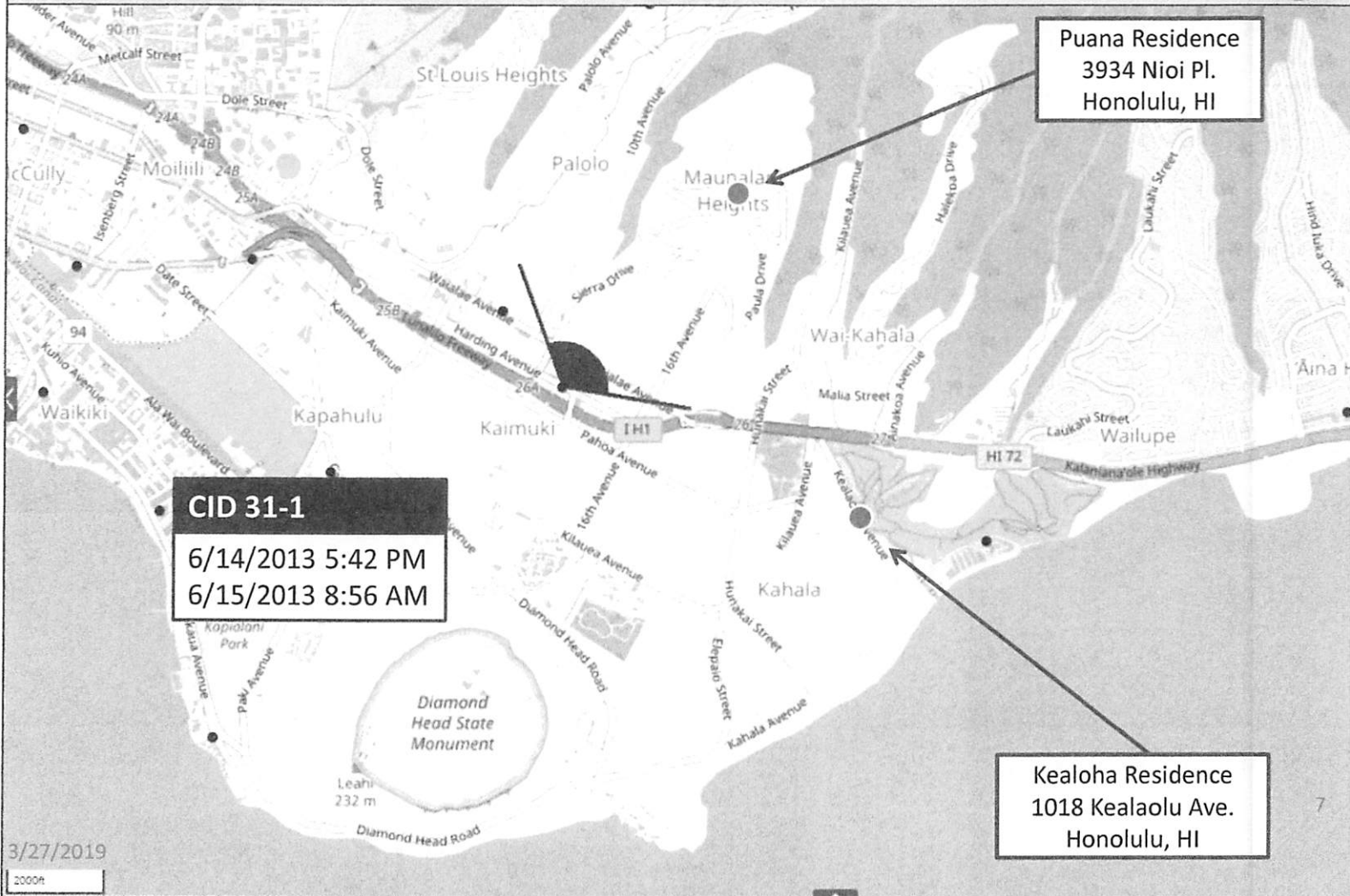
Cell Tower Activations

June 7 - 8, 2013 (HST)



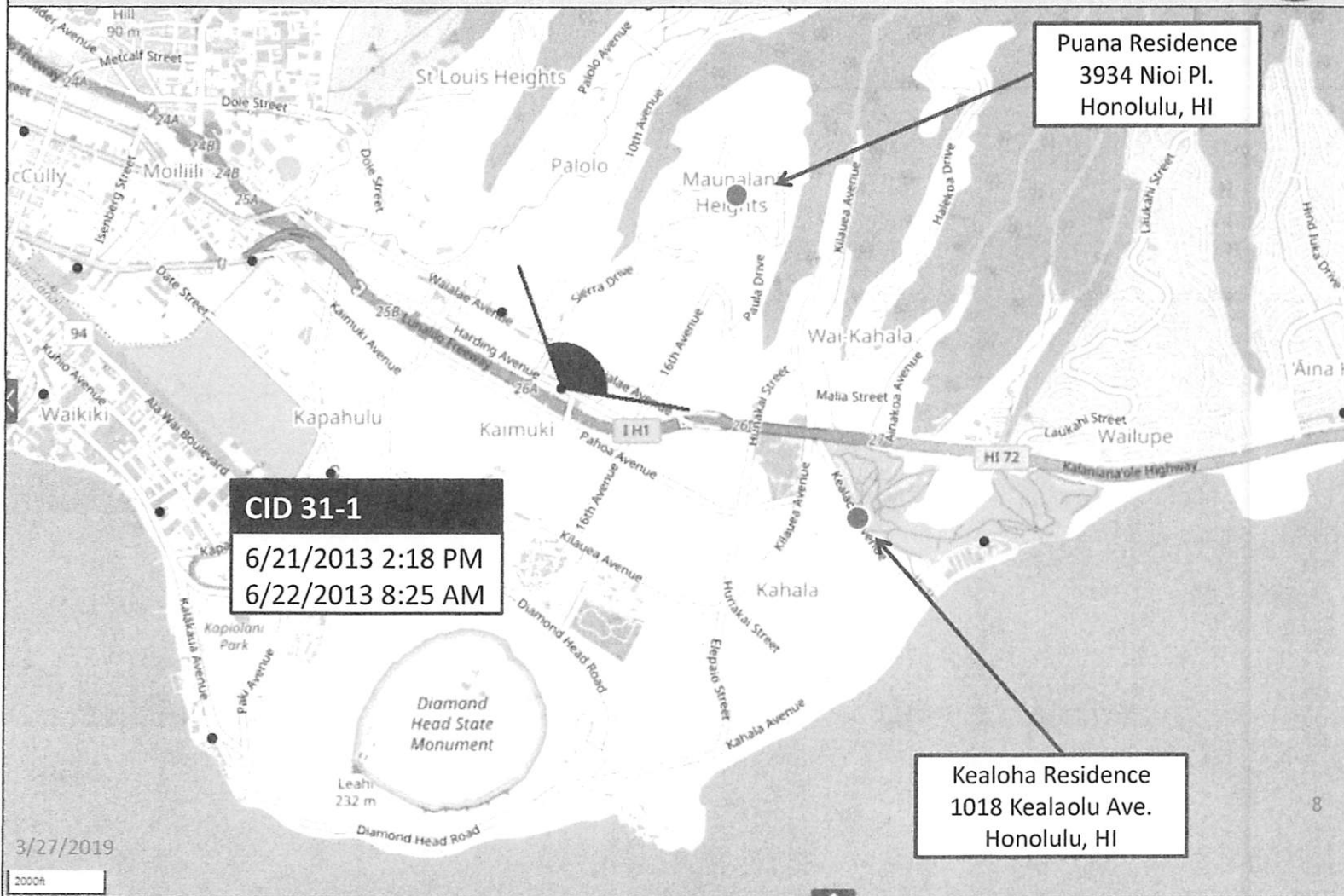
Historical Cell Site Analysis

Cell Tower Activations
June 14 - 15, 2013 (HST)



Historical Cell Site Analysis

Cell Tower Activations
June 21 - 22, 2013 (HST)



Historical Cell Site Analysis

Cell Tower Activations

June 28 - 29, 2013 (HST)



CID 31-1

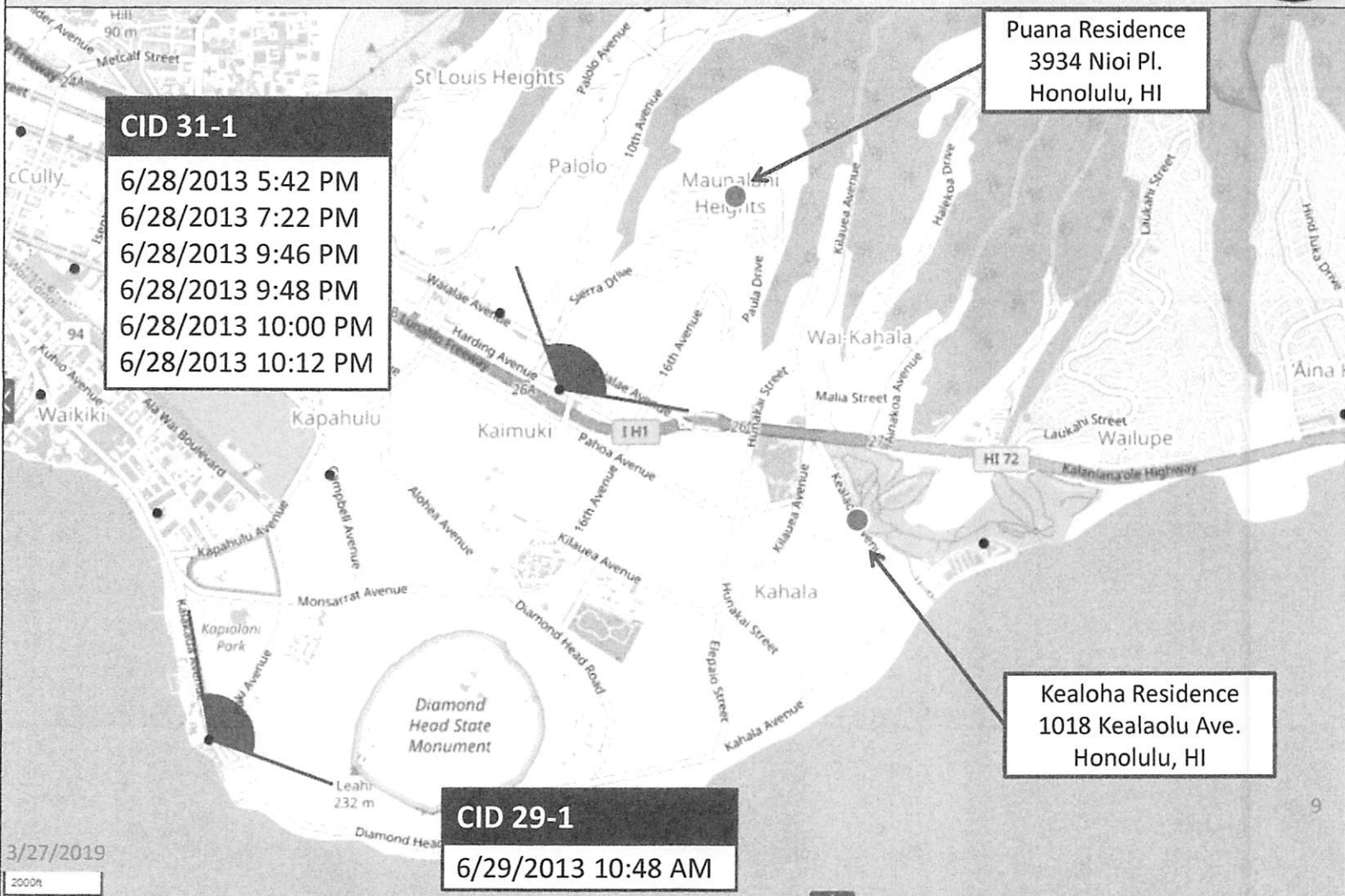
6/28/2013 5:42 PM
6/28/2013 7:22 PM
6/28/2013 9:46 PM
6/28/2013 9:48 PM
6/28/2013 10:00 PM
6/28/2013 10:12 PM

Puana Residence
3934 Nioi Pl.
Honolulu, HI

Kealoha Residence
1018 Kealaolu Ave.
Honolulu, HI

CID 29-1

6/29/2013 10:48 AM



Historical Cell Site Analysis

Cell Tower Activations on CID 32-3 Between June 21 - 28, 2013 (HST)

